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February 11, 2019

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A-235  
Washington, D.C. 20554

**Writer's Direct Access**  
**C. Douglas Jarrett**  
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**Re:** Notice of Ex Parte Communication, GN Docket No. 18-238


Dear Ms. Dortch:

On February 8, 2019, the undersigned met with Adam Copeland, Pam Megna, and Alexis Johns of the Wireline Competition Bureau on behalf of the National Rural Electric Cooperative Association (NRECA), reviewing NRECA's Comments filed in response to the Notice of Inquiry for the Commission's 15<sup>th</sup> Broadband Deployment Report in the referenced proceeding.

Several points were emphasized, including (i) that the Digital Divide be gauged based on the recent deployments of DOCSIS 3.1 cable technology and high capacity fiber networks in urban areas and not a weighted average of existing fixed broadband deployments, (ii) the fixed broadband benchmark be updated periodically to reflect these new deployments in urban areas and the higher performance tiers selected by CAF II auction winners, particularly fiber-based networks of NRECA's members, and (iii) the need to mitigate the risk of substantial overstatement of broadband availability (at 10/1 Mbps or higher data rates) in rural areas based on how the Form 477 questionnaire instructs fixed broadband providers to characterize census blocks as "served" or "unserved."

Please feel free to contact the undersigned with any questions.

Sincerely,



C. Douglas Jarrett

cc: Via Email:  
Adam Copeland  
Pam Megna  
Alexis Johns